

**BOBBY JINDAL**  
GOVERNOR



**HAROLD LEGGETT, PH.D.**  
SECRETARY

## State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY

ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20080003  
Agency Interest No. 4174

Riaz Bismilla  
Director of Carbon Operations  
Sid Richardson Carbon & Energy Company  
201 Main St., Ste 3000  
Fort Worth, TX 76102

RE: Part 70 Operating Permit Renewal, Addis Facility  
Sid Richardson Carbon & Energy Company, Addis, West Baton Rouge Parish, Louisiana

Dear Mr. Bismilla:

This is to inform you that the permit renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Permit No.: 3120-00006-V1

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary  
CSN:dcd  
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Addis Facility  
Agency Interest No.: 4174  
Sid Richardson Carbon & Energy Company  
Addis, West Baton Rouge Parish, Louisiana**

**I. Background**

Sid Richardson Carbon & Energy Company's Addis Facility is an existing carbon black manufacturing facility which began operation prior to 1968. The Addis Facility currently operates under Permit No. 3120-00006-V0, issued October 15, 2003.

This is the Part 70 operating permit for the facility.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by Sid Richardson Carbon & Energy Company on June 23, 2008, requesting a Part 70 operating permit renewal.

**III. Description**

The Addis Plant operates three carbon black production units, designated as Unit 1, Unit 2, and Unit 3. These units produce carbon black by the oil furnace process.

**Reaction Step**

Each unit operates with one or more reactors in a reactor train. In each reactor, natural gas or carbon black feedstock oil (CBO) is combusted with air to produce a hot combustion stream. CBO is injected into the hot combustion stream. The CBO is a heavy hydrocarbon liquid with a small amount of sulfur. The oil is thermally cracked forming an aerosol comprised of very fine solid carbon particles and products of combustion ( $H_2O$ ,  $N_2$ ,  $H_2$ ,  $CO$ ,  $CO_2$ , and small amounts of  $CH_4$ ,  $C_2H_2$ ,  $NO_x$ ,  $H_2S$ , and other reduced sulfur compounds). The carbon and gaseous mixture is called smoke. Water is injected at the reactors to cool the smoke to 1,000-1,500 °F to stop the cracking. The smoke is further cooled to 500 °F with heat exchangers and additional quench water.

**Primary Filtering Step, and Flaring**

The smoke from the set of reactors in each unit enters a bag filter (called a primary bag filter, PBF) which separates over 99.9% of the carbon black from the gaseous products of combustion, called tailgas. A portion of the tailgas is used in the drying step described later. The remaining tailgas is flared (flare stacks B-1, B-2, B-3). The flared tailgas is called fluegas and contains  $H_2O$ ,  $N_2$ ,  $CO_2$ ,  $O_2$ , and small amounts of  $CO$ ,  $C_2H_2$ ,  $NO_x$ ,  $SO_2$ , and other reduced sulfur compounds).

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Pelletizing Step

The black collected in the PBF is air conveyed to an elevated location to a secondary bag filter (SBF). Over 99.9% of the conveyed black is recovered in the SBF. The SBF stacks are designated SF-1, SF-2, and SF-3A. The black collected in the SBF is fed by gravity to pulverizers, and then to pelletizers where the black is mixed with water to form small beads to increase bulk density.

Drying Step

The wet black from the pelletizers is gravity fed to indirect-fired rotary dryers. Tailgas from the Primary Filtering Step is combusted in incinerator-like burners at the dryers to supply heat to dry the wet pelleted carbon black. The combusted tailgas (called flue gas) leaves the dryers and vents to the atmosphere via two stacks (D-2.7 and D-5.0). The fluegas contains H<sub>2</sub>O, N<sub>2</sub>, CO<sub>2</sub>, O<sub>2</sub>, and small components of CO, C<sub>2</sub>H<sub>2</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and other reduced sulfur compounds.

Pelleting water evaporated at the dryers contains a small amount of entrained carbon black dust, which is collected in the dryer exhaust bag filter (DEBF), and is air conveyed to the SBF. Over 99.9% of the entrained carbon black is recovered in the DEBFs. The DEBF stacks are designated DF-1, DF-2, and DF-3.

Storage and Shipping Step

The dry pelletized carbon black is conveyed by bucket elevators, screw conveyors, and belt conveyors from the dryers to silos for storage. The black is loaded for customer shipment into semi-bulk (paper bags and big bags), and in bulk (railcars and hopper trucks). Dust collection systems pneumatically convey fugitive carbon black dust from the storage conveying systems and loading/shipping activities to the SBFs.

With the application submitted on June 23, 2008, Sid Richardson Carbon & Energy Company proposes to renew the Part 70 operating permit for their Addis Facility.

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Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	480.90	480.90	-
SO <sub>2</sub>	9,930.30	9,930.30	-
NO <sub>X</sub>	439.10	439.10	-
CO	2,460.30	2460.30	-
VOC *	127.40	127.40	-

<u>*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):</u>		<u>Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):</u>	
Pollutant	Emissions	Pollutant	Emissions
Carbon disulfide	51.70	Hydrogen Sulfide	51.70
Carbonyl sulfide	17.45		
Total	69.15	Total	51.70

Other VOC (TPY): 58.25

#### **IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Carbon disulfide (Class II), carbonyl sulfide (Class III), and hydrogen sulfide (Class III) are emitted in amounts that exceed the major source threshold. Carbon disulfide (Class II) is emitted in an amount that exceeds its Minimum Emission Rate (MER). Therefore, this facility must address MACT.

MACT for this facility has been determined to be compliance with 40 CFR 63 Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards.

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**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

**VIII. General Condition XVII Activities**

None

**IX. Insignificant Activities**

ID No.:	Description	Citation
1-92	Oil Preheater (1.5 MMBTU/hr)	LAC 33:III.501.B.5.A.1
-	Refractory Curing Pad (2.0 MMBTU/hr)	LAC 33:III.501.B.5.A.1
-	Two (2) Diesel Tanks (500 gallons each)	LAC 33:III.501.B.5.A.3

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<u>ID No.:</u>	<u>Description</u>	<u>Citation</u>
-	Binding Agent Tank (8806 gallons)	LAC 33:III.501.B.5.A.3
-	Two (2) Water Heaters (0.36 MMBTU/hr each)	LAC 33:III.501.B.5.A.5
-	Laboratory Emissions	LAC 33:III.501.B.5.A.6

## LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2115	2116*	2123	22	29*	51*	53*	56	59*
UNF 1	Entire Facility																			
EQT 1	B-1 – Unit #1 Flare								1		1									3
EQT 2	B-2 – Unit #2 Flare								1		1									3
EQT 3	B-3 – Unit #3 Flare								1		1									3
EQT 4	D-2.7 – West Dryer Stack																			3
EQT 5	D-5.0 – East Dryer Stack								1		1									3
EQT 6	DF-1 – Dryer Bag Filter No. 1								1		1									3
EQT 7	DF-2 – Dryer Bag Filter No. 2									1										
EQT 8	SF-1 – Secondary Filter No. 1										1									
EQT 9	SF-2 – Secondary Filter No. 2										1									
EQT 10	SF-3A – Secondary Filter No. 3A										1									
EQT 11	30 – Fire Water Pump									1	3									
EQT 12	40 – South Oil Tank #1											3								
EQT 13	41 – North Oil Tank #1											3								
EQT 14	42 – Gasoline Tank											1								
EQT 15	U-1 – Reactor Unit 1										1									
EQT 16	U-2 – Reactor Unit 2										1									

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ID No.:	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2115	2116*	2123	22	29*	51*	53*	56	59*
EQT 17	U-3 – Reactor Unit 3		1																	
EQT 19	DF-3 – Dryer Bag Filter No. 3																			
EQT 20	Unit 1 PBF – Unit 1 Primary Bag Filter																			
EQT 21	Unit 2 PBF – Unit 2 Primary Bag Filter																			
EQT 22	Unit 3 PBF – Unit 3 Primary Bag Filter																			
FUG 1	50 – Fugitive Emissions																			

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

**KEY TO MATRIX**

- 1 - The regulations have applicable requirements that apply to this particular emission source.  
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR	
		A	K	Ka	Kb	Dc	SS	YY	III	A	J	V	A	HH	SS	VV	HHH	64	68		
UNF 1	Entire Facility																				
EQT 1	B-1 – Unit #1 Flare									1	1										
EQT 2	B-2 – Unit #2 Flare									1	1										
EQT 3	B-3 – Unit #3 Flare									1	1										
EQT 4	D-2.7 – West Dryer Stack									1	1										
EQT 5	D-5.0 – East Dryer Stack									1	1										
EQT 6	DF-1 – Dryer Bag Filter No. 1																				3
EQT 7	DF-2 – Dryer Bag Filter No. 2																				3
EQT 8	SF-1 – Secondary Filter No. 1																				3
EQT 9	SF-2 – Secondary Filter No. 2																				3
EQT 10	SF-3A – Secondary Filter No. 3A																				3
EQT 11	30 – Fire Water Pump																	3			
EQT 12	40 – South Oil Tank #1																				
EQT 13	41 – North Oil Tank #1									3											
EQT 14	42 – Gasoline Tank																				
EQT 15	U-1 – Reactor Unit 1																				
EQT 16	U-2 – Reactor Unit 2																				

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ID No.:	Description	40 CFR 60 NSPS								40 CFR 61				40 CFR 63 NESHAP				40 CFR	
		A	K	Ka	Kb	Db	Dc	SS	YY	III	A	J	V	A	HH	SS	VV	HHH	64
EQT 17	U-3 – Reactor Unit 3																		
EQT 19	DF-3 – Dryer Bag Filter No. 3																		3
EQT 20	Unit 1 PBF – Unit 1 Primary Bag Filter									1									
EQT 21	Unit 2 PBF – Unit 2 Primary Bag Filter									1									
EQT 22	Unit 3 PBF – Unit 3 Primary Bag Filter									1									
FUG 1	50 – Fugitive Emissions																		

**KEY TO MATRIX**

- 1 -The regulations have applicable requirements that apply to this particular emission source.
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Blank – The regulations clearly do not apply to this type of emission source.

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
EQTs 1-5	Control of Emissions of Nitrogen Oxides (NO <sub>x</sub> ) [LAC 33:III.2201]	EXEMPT. Sources are flares, kilns, or ovens. [LAC 33:III.2201.C.7]
	Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A]	DOES NOT APPLY. Source emits less than 5 tons per year of sulfur dioxide. [LAC 33:III.1502.A.3]
EQT 11	Control of Emissions of Nitrogen Oxides (NO <sub>x</sub> ) [LAC 33:III.2201]	EXEMPT. Engine is operated exclusively for firefighting. [LAC 33:III.2201.C.5]
	NSPS Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [40 CFR 60.4200]	DOES NOT APPLY. Engine was ordered and constructed prior to the 2008 model year. [40 CFR 60.4200(a)(1)(i)]
EQT 12	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. Contents of tank have maximum true vapor pressure of less than 1.5 psia. [40 CFR 60.112a(a)]
EQT 13	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978.	DOES NOT APPLIED. Tank was constructed prior to June 11, 1973. [40 CFR 60.110(c)(1)]
EQT 12 EQT 13	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Contents of tanks have maximum true vapor pressure of less than 1.5 psia. [LAC 33:III.2103.A]

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ID No:	Requirement	Notes
EQT 6	Compliance Assurance Monitoring (CAM)	DOES NOT APPLY. Baghouses are considered to be inherent process equipment. [40 CFR 64.1]
EQT 7		
EQT 8	[40 CFR 64]	
EQT 9		
EQT 10		
EQT 19		

The above table provides explanation for either the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

## 40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.  
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

## 40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
  
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
  
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
  
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
  
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
  - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;

## 40 CFR PART 70 GENERAL CONDITIONS

4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

## 40 CFR PART 70 GENERAL CONDITIONS

- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

## **LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 23, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.  
  
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:

1. Report by June 30 to cover January through March
2. Report by September 30 to cover April through June
3. Report by December 31 to cover July through September
4. Report by March 31 to cover October through December

D. Each report submitted in accordance with this condition shall contain the following information:

1. Description of noncomplying emission(s);
2. Cause of noncompliance;
3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

**AI ID:** 4174 Sid Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

Also Known As:	ID	Name	User Group	Start Date
	3120-00006	Sid Richardson Carbon & Energy Co	CDS Number	08-05-2002
LAR000027656		Sid Richardson Carbon & Energy Co	Hazardous Waste Notification	02-11-2000
LA0047554	LPDES #	LPDES Permit #	LPDES Permit #	06-25-2003
WP0793	LWDPS #	LWDPS Permit #	LWDPS Permit #	06-25-2003
GD-121-0097	Site ID #	Solid Waste Facility No.	Solid Waste Facility No.	05-01-2001
70710SDRCHPOBOX	TRI #	Toxic Release Inventory	Toxic Release Inventory	07-19-2004
Physical Location:		52221 Sid Richardson @ Hwy 1 S Addis, LA 70710	Main Phone:	2253435704
Mailing Address:		PO Box 267 Addis, LA 707100267		
Location of Front Gate:		30° 19' 47" N latitude, 91° 16' 43" W longitude, 91° 16' 43" W longitude, Coordinate Method: GPS-Unspecified, Coordinate Datum: NAD27		
Related People:	Name	Mailing Address	Phone (Type)	Relationship
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	lbnguyen@sidrich.cc	Responsible Official for
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	8173397450 (WP)	Responsible Official for
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	8173397450 (WP)	Solid Waste Billing Party for
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	lbnguyen@sidrich.cc	Water Billing Party for
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	lbnguyen@sidrich.cc	Solid Waste Billing Party for
Riaz Bismillia		201 Main St Ste 3000 Fort Worth, TX 76102	8173397450 (WP)	Water Billing Party for
Riaz Bismillia		PO Box 267 Addis, LA 70710	2253435704 (WP)	Hazardous Waste Permit Contact For
Keith Boudreaux		201 Main St Ste 3000 Fort Worth, TX 76102	LBNGUYEN@SIDRI	Emission Inventory Contact for
Long Nguyen		201 Main St Ste 3000 Fort Worth, TX 76102	8173908604 (WP)	Emission Inventory Contact for
Long Nguyen		201 Main St Ste 3000 Fort Worth, TX 76102		Air Permit Contact For
John Simon				
Related Organizations:	Name	Address	Phone (Type)	Relationship
Sid Richardson Carbon & Energy Co		201 Main St Ste 3000 Fort Worth, TX 76102		Air Billing Party for
Sid Richardson Carbon & Energy Co		201 Main St Ste 3000 Fort Worth, TX 76102		Owns
Sid Richardson Carbon & Energy Co		201 Main St Ste 3000 Fort Worth, TX 76102		Operates
Sid Richardson Carbon & Energy Co		201 Main St Ste 3000 Fort Worth, TX 76102		Water Billing Party for
Sid Richardson Carbon & Energy Co		201 Main St Ste 3000 Fort Worth, TX 76102		Emission Inventory Billing Party
NAIC Codes:		3225182, Carbon Black Manufacturing		

General Information

AI ID: 4174 Sid Richardson Carbon & Energy Co  
Activity Number: PER20080003  
Permit Number: 3120-00006-V1  
Air - Title V Regular Permit Renewal

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

**INVENTORIES**

AI ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER2008003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Addis Facility</b>						
EQT0001	B-1 - Unit # 1 Flare		1.42 MM scf/hr	1.33 MM scf/hr		8760 hr/yr (All Year)
EQT0002	B-2 - Unit # 2 Flare		1.44 MM scf/hr	1.35 MM scf/hr		8760 hr/yr (All Year)
EQT0003	B-3 - Unit # 3 Flare		1.77 MM scf/hr	1.66 MM scf/hr		8760 hr/yr (All Year)
EQT0004	D-2.7 - West Dyer Stack		.38 MM scf/hr	.36 MM scf/hr		8760 hr/yr (All Year)
EQT0005	D-5.0 - East Dyer Stack		1.61 MM scf/hr	1.51 MM scf/hr		8760 hr/yr (All Year)
EQT0006	DF-1 - Dyer Bag Filter No. 1		194.6 MM lbs/yr	194.6 MM lbs/yr		8760 hr/yr (All Year)
EQT0007	DF-2 - Dyer Bag Filter No. 2		155.3 MM lbs/yr	155.3 MM lbs/yr		8760 hr/yr (All Year)
EQT0008	SF-1 - Secondary Filter No. 1		100 MM lbs/yr	100 MM lbs/yr		8760 hr/yr (All Year)
EQT0009	SF-2 - Secondary Filter No. 2		83.1 MM lbs/yr	83.1 MM lbs/yr		8760 hr/yr (All Year)
EQT0010	SF-3A - Secondary Filter No. 3A		155.3 MM lbs/yr	155.3 MM lbs/yr		8760 hr/yr (All Year)
EQT0011	30 - Fire Water Pump		88 horsepower	88 horsepower		52 hr/yr (All Year)
EQT0012	40 - South Oil Tank # 1		1.49 MM bbl/yr	1.49 MM bbl/yr		8760 hr/yr (All Year)
EQT0013	41 - North Oil Tank # 1		.64 MM bbl/yr	.64 MM bbl/yr		8760 hr/yr (All Year)
EQT0015	U-1 - Reactor Unit 1					8760 hr/yr (All Year)
EQT0016	U-2 - Reactor Unit 2					8760 hr/yr (All Year)
EQT0017	U-3 - Reactor Unit 3					8760 hr/yr (All Year)
EQT0019	DF-3 - Dyer Bag Filter No. 3		160.9 MM lbs/yr	160.9 MM lbs/yr		8760 hr/yr (All Year)
EQT0020	Unit 1 PBF - Unit 1 Primary Bag Filter					8760 hr/yr (All Year)
EQT0021	Unit 2 PBF - Unit 2 Primary Bag Filter					8760 hr/yr (All Year)
EQT0022	Unit 3 PBF - Unit 3 Primary Bag Filter					8760 hr/yr (All Year)
FUG0001	50 - Fugitive Emissions					8760 hr/yr (All Year)

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
<b>Addis Facility</b>							
EQT0001	B-1 - Unit # 1 Flare	65.6	41471	5.4		106.6	1832
EQT0002	B-2 - Unit # 2 Flare	65.6	41970	5.6		106.6	1832
EQT0003	B-3 - Unit # 3 Flare	65.6	51587	5.5		106.6	1832
EQT0004	D-2.7 - West Dyer Stack	79.1	26951	2.7		196	702
EQT0005	D-5.0 - East Dyer Stack	100	124824	5		198	765
EQT0006	DF-1 - Dyer Bag Filter No. 1	65	24124	2.8		120	400
EQT0007	DF-2 - Dyer Bag Filter No. 2	30	13679	2		120	400
EQT0008	SF-1 - Secondary Filter No. 1	168	14000	1.33		85.5	200
EQT0009	SF-2 - Secondary Filter No. 2	168	14000	1.33		85.5	200
EQT0010	SF-3A - Secondary Filter No. 3A	276	23000	1.33		85.5	200
EQT0011	30 - Fire Water Pump	62.4	104	.19		9	500
EQT0012	40 - South Oil Tank # 1					40	160

**INVENTORIES**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER2008003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
<b>Addis Facility</b>							
EQT0013	41 - North Oil Tank # 1					23.5	160
EQT0019	DF-3 - Dyer Bag Filter No. 3	33	14156	3		120	400

**Relationships:**

ID	Description	Relationship	ID	Description
EQT0001	B-1 - Unit # 1 Flare	Controls emissions from	EQT0015	U-1 - Reactor Unit 1
EQT0002	B-2 - Unit # 2 Flare	Controls emissions from	EQT0016	U-2 - Reactor Unit 2
EQT0003	B-3 - Unit # 3 Flare	Controls emissions from	EQT0017	U-3 - Reactor Unit 3
EQT0004	D-2.7 - West Dyer Stack	Controls emissions from	EQT0017	U-3 - Reactor Unit 3
EQT0005	D-5.0 - East Dyer Stack	Controls emissions from	EQT0015	U-1 - Reactor Unit 1
EQT0005	D-5.0 - East Dyer Stack	Controls emissions from	EQT0016	U-2 - Reactor Unit 2
EQT0005	D-5.0 - East Dyer Stack	Controls emissions from	EQT0017	U-3 - Reactor Unit 3
EQT0006	DF-1 - Dyer Bag Filter No. 1	Controls emissions from	EQT0015	U-1 - Reactor Unit 1
EQT0006	DF-1 - Dyer Bag Filter No. 1	Controls emissions from	EQT0016	U-2 - Reactor Unit 2
EQT0007	DF-2 - Dyer Bag Filter No. 2	Controls emissions from	EQT0017	U-3 - Reactor Unit 3
EQT0008	SF-1 - Secondary Filter No. 1	Controls emissions from	EQT0015	U-1 - Reactor Unit 1
EQT0009	SF-2 - Secondary Filter No. 2	Controls emissions from	EQT0016	U-2 - Reactor Unit 2
EQT0010	SF-3A - Secondary Filter No. 3A	Controls emissions from	EQT0017	U-3 - Reactor Unit 3
EQT0019	DF-3 - Dyer Bag Filter No. 3	Controls emissions from	EQT0017	U-3 - Reactor Unit 3

**Subject Item Groups:**

ID	Group Type	Group Description
CRG0001	Common Requirements Group	BF - Bag Filters
CRG0002	Common Requirements Group	FC - Facility Cap
UNF0001	Unit or Facility Wide	Entire Facility - Addis Facility

**Group Membership:**

ID	Description	Member of Groups
EQT0001	B-1 - Unit # 1 Flare	CRG0000000002
EQT0002	B-2 - Unit # 2 Flare	CRG0000000002
EQT0003	B-3 - Unit # 3 Flare	CRG0000000002
EQT0004	D-2.7 - West Dyer Stack	CRG0000000002
EQT0005	D-5.0 - East Dyer Stack	CRG0000000002
EQT0006	DF-1 - Dyer Bag Filter No. 1	CRG0000000001, CRG0000000002
EQT0007	DF-2 - Dyer Bag Filter No. 2	CRG0000000001
EQT0008	SF-1 - Secondary Filter No. 1	CRG0000000001, CRG0000000002
EQT0009	SF-2 - Secondary Filter No. 2	CRG0000000001, CRG0000000002

INVENTORIES

AI ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER20080003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

## Group Membership:

ID	Description	Member of Groups
EQT0010	SF-3A - Secondary Filter No. 3A	CRG000000000001, CRG000000000002
EQT0019	DF-3 - Dryer Bag Filter No. 3	CRG000000000001, CRG000000000002
EQT0020	Unit 1 PBF - Unit 1 Primary Bag Filter	CRG000000000002
EQT0021	Unit 2 PBF - Unit 2 Primary Bag Filter	CRG000000000002
EQT0022	Unit 3 PBF - Unit 3 Primary Bag Filter	CRG000000000002
FUG0001	50 - Fugitive Emissions	CRG000000000002

**NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group**

## Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0680	Carbon Black Manufacture (Rated Capacity)	259.2	MM Lb/Yr

## SIC Codes:

2895	Carbon black	A14174
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EMISSION RATES FOR CRITERIA POLLUTANTS

AIID: 4174 - Sid Richardson Carbon &amp; Energy Co

Activity Number: PER20080003

Permit Number: 3120-00006-V1

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
<b>Addis Facility</b>															
CRG 0002 FC	560.46	2454.82	100.24	439.04	106.17	465.01	2267.19			9930.30	26.87				
EQT 0001 B-1	180.90	6.210			15.40			523.15			7.300				
EQT 0002 B-2	184.76	6.140			12.810			485.17			6.230				
EQT 0003 B-3	196.95	6.81			23.93			680.51			5.70				
EQT 0004 D-2.7	7.76	20.08			9.17			145.85			1.29				
EQT 0005 D-5.0	26.04	57.42			30.81			577.96			8.06				
EQT 0006 DF-1					0.84										
EQT 0007 DF-2					0.71										
EQT 0008 SF-1					5.70										
EQT 0009 SF-2					4.74										
EQT 0010 SF-3A					8.86										
EQT 0011 30	0.18	0.21	<0.01	1.30	1.57	0.03	<0.01	<0.01	<0.01				0.06	0.07	<0.01
EQT 0012 40													0.05	0.15	0.22
EQT 0013 41													0.03	0.10	0.12
EQT 0019 DF-3															
FUG 0001 50	1.24	1.24	5.44				3.63	3.63	15.90				2.14	2.14	9.39

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 4174 - Sid Richardson Carbon &amp; Energy Co

Activity Number: PER20080003

Permit Number: 3120-00006-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CRG 0002 FC	Carbon disulfide	11.80		51.70
	Carbonyl sulfide	3.980		17.450
	Hydrogen sulfide	11.800		51.700
EQT 0001 B-1	Carbon disulfide		2.720	
	Carbonyl sulfide		0.910	
	Hydrogen sulfide		2.720	
EQT 0002 B-2	Carbon disulfide		2.530	
	Carbonyl sulfide		0.840	
	Hydrogen sulfide		2.530	
EQT 0003 B-3	Carbon disulfide		3.540	
	Carbonyl sulfide		1.160	
	Hydrogen sulfide		3.540	
EQT 0004 D-2.7	Carbon disulfide		0.760	
	Carbonyl sulfide		0.250	
	Hydrogen sulfide		0.760	
EQT 0005 D-5.0	Carbon disulfide		3.010	
	Carbonyl sulfide		1.000	
	Hydrogen sulfide		3.010	
FUG 0001 50	Carbon disulfide	< 0.001	< 0.001	0.002
	Carbonyl sulfide	< 0.001	< 0.001	0.001
	Hydrogen sulfide	< 0.001	< 0.001	0.002
UNF 0001 Entire Facility	Carbon disulfide			51.70
	Carbonyl sulfide			17.45
	Hydrogen sulfide			51.70

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**CRG0001 Bag Filters**

Group Members: EQT0006 EQT0007 EQT0008 EQT0009 EQT0010 EQT0019

- 1 [LAC 33.III.501.C.6] Particulate matter (10 microns or less) >= 99.9 % removal efficiency from filter manufacturer's certification.  
Which Months: All Year Statistical Basis: None specified
- 2 [LAC 33.III.507.H.1.a] Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary.  
Which Months: All Year Statistical Basis: None specified
- 3 [LAC 33.III.507.H.1.a] Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
- 4 [LAC 33.III.507.H.1.a] Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.  
Which Months: All Year Statistical Basis: None specified
- 5 [LAC 33.III.507.H.1.a] Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

**CRG0002 Facility Cap**

Group Members: EQT0001 EQT0002 EQT0003 EQT0004 EQT0005 EQT0006 EQT0008 EQT0009 EQT0010 EQT0019 EQT0020 EQT0021 EQT0022 FUG0001

- Submit report: Due annually, by the 31st of March. Report the total sulfur loading rate for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- Total Sulfur Loading Rate <= 1771 lb/hr and <= 7288 tons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total sulfur loading rate exceeds the maximum listed in this specific condition for any twelve consecutive month period.  
Which Months: All Year Statistical Basis: None specified
- Total Sulfur Loading Rate monitored by technically sound method continuously.  
Which Months: All Year Statistical Basis: None specified
- Total Sulfur Loading Rate recordkeeping by electronic or hard copy monthly. Keep records of the total sulfur loading rate each month, as well as the total sulfur loading rate for the last twelve months. Make records available for inspection by DEQ personnel.

**EQT0001 B-1 - Unit # 1 Flare**

- Monitor flares to assure that they are operated and maintained in conformance with their designs. Subpart A. [40 CFR 63.11(b)(1)]
- Operate at all times when emissions may be vented to the flare. Subpart A. [40 CFR 63.11(b)(3)]
- Design and operate for no visible emissions, as determined using Test Method 22 in Appendix A of 40 CFR 60, except for periods not to exceed a total of 5 minutes during any two consecutive hours. Subpart A. [40 CFR 63.11(b)(4)]
- Operate with a flame present at all times. Subpart A. [40 CFR 63.11(b)(5)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0001 B-1 - Unit # 1 Flare**

- 14 [40 CFR 63.11(b)(5)]  
 Presence of a flame monitored by flame monitor continuously. Use a thermocouple or any other equivalent device to detect the presence of a flame. Subpart A. [40 CFR 63.11(b)(5)]
- 15 [40 CFR 63.11(b)(6)(i)(A)]  
 Which Months: All Year Statistical Basis: None specified  
 Diameter  $\geq$  3 in; nonassisted; Hydrogen content  $\geq$  8 % by volume; Exit Velocity  $<$  122 ft/sec (37.2 m/sec) and  $<$  Vmax, as determined using the equation specified in 40 CFR 63.11(b)(6)(i)(A). Subpart A. [40 CFR 63.11(b)(6)(i)(A)]
- 16 [40 CFR 63.11(b)(6)(i)(B)]  
 Which Months: All Year Statistical Basis: None specified  
 Determine the actual exit velocity using the method specified in 40 CFR 63.11(b)(7)(i). Subpart A. [40 CFR 63.11(b)(6)(i)(B)]
- 17 [40 CFR 63.1103(d)(3)]  
 Comply with the requirements of 40 CFR 63 Subpart SS. Subpart YY. [40 CFR 63.1103(d)(3)]
- 18 [40 CFR 63.983(a)(1)]  
 Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]
- 19 [40 CFR 63.983(a)(2)]  
 Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]
- 20 [40 CFR 63.983(a)(3)(i)]  
 Closed-vent systems (containing bypass lines): Flow monitored by flow indicator at the regulation's specified frequency. Ensure that the flow indicator is capable of taking periodic readings. Install at the entrance to any bypass line. Subpart SS. [40 CFR 63.983(a)(3)(i)]
- 21 [40 CFR 63.983(b)(1)(i)(A)]  
 Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
- 22 [40 CFR 63.983(b)(1)(i)(B)]  
 Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]
- 23 [40 CFR 63.983(b)(1)(ii)]  
 Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]
- 24 [40 CFR 63.983(b)(2)(i)]  
 Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- 25 [40 CFR 63.983(b)(2)(ii)]  
 Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
- 26 [40 CFR 63.983(b)(3)(i)]  
 Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0001 B-1 - Unit # 1 Flare**

- 27 [40 CFR 63.983(b)(3)(ii)] Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 28 [40 CFR 63.983(b)(4)(i)] Closed-vent systems (containing bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Subpart SS. [40 CFR 63.983(b)(4)(i)]
- 29 [40 CFR 63.983(b)(4)(ii)] Closed-vent systems (containing bypass lines): Equipment/operational data monitored by visual inspection/determination monthly. Visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. Subpart SS. [40 CFR 63.983(b)(4)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 30 [40 CFR 63.983(d)(1)] Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(4)(ii)]
- 31 [40 CFR 63.983(d)(2)] Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 32 [40 CFR 63.983(d)(3)] Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- 33 [40 CFR 63.987(a)] Meet the performance requirements in 40 CFR 63.11(b). Subpart SS. [40 CFR 63.987(a)]
- 34 [40 CFR 63.987(b)] Conduct an initial flare compliance assessment that meets the requirements specified in 40 CFR 63.987(b)(3)(i) through (b)(3)(iv). Subpart SS. [40 CFR 63.987(b)]
- 35 [40 CFR 63.987(c)] Presence of a flame monitored by the regulation's specified method(s) continuously. Use a device (including but not limited to a thermocouple, ultra-violet beam sensor, or infrared sensor) capable of continuously detecting that at least one pilot flame or the flare flame is present. Subpart SS. [40 CFR 63.987(c)]
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- 36 [40 CFR 63.998] Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
- 37 [40 CFR 63.999(a)(1)(i)]
- 38 [40 CFR 63.999(a)(1)(ii)]

**SPECIFIC REQUIREMENTS**

A1 ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER20080003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

**EQT0001 B-1 - Unit # 1 Flare**

- 39 [40 CFR 63.999(a)(1)(iii)]  
 Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
- 40 [40 CFR 63.999(a)(1)(iv)]  
 Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
- 41 [40 CFR 63.999(b)]  
 Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 42 [40 CFR 63.999(c)]  
 Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 43 [40 CFR 63.999(d)(1)]  
 Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1)(i) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 44 [40 CFR 63.999(d)(2)]  
 Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 45 [LAC 33:III.1.105]  
 Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
- Which Months: All Year Statistical Basis: None specified
- 46 [LAC 33:III.1.105]  
 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:1.3923. Notification is required only if the upset cannot be controlled in six hours.
- Sulfur dioxide <= 2000 ppmv at standard conditions.
- Which Months: All Year Statistical Basis: Three-hour average
- Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
- Control process gas streams by flaring or combustion.
- Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- Submit compliance determination results: Due no later than 90 days after completion of test.
- Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- Make all compliance data available to a representative of DEQ or the U.S. EPA on request.

**SPECIFIC REQUIREMENTS**

AI ID: 4174 - Std Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

**EQT0001 B-1 - Unit # 1 Flare**

- 54 [LAC 33:III.15(3.E)] Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 55 [LAC 33:III.15(3.E)] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- The permittee shall maintain a record of flare outages and report them to the Office of Environmental Compliance with the annual report under LAC 33:III.918.
- This strokeless flare shall be equipped with a flame detection and automatic alarm system that will immediately signal outage of the pilot light.

**EQT0002 B-2 - Unit # 2 Flare**

- 58 [40 CFR 63.1](b)(1)] Monitor flares to assure that they are operated and maintained in conformance with their designs. Subpart A. [40 CFR 63.11(b)(1)]
- 59 [40 CFR 63.1](b)(3)] Operate at all times when emissions may be vented to the flare. Subpart A. [40 CFR 63.11(b)(3)]
- 60 [40 CFR 63.1](b)(4)] Design and operate for no visible emissions, as determined using Test Method 22 in Appendix A of 40 CFR 60, except for periods not to exceed a total of 5 minutes during any two consecutive hours. Subpart A. [40 CFR 63.11(b)(4)]
- 61 [40 CFR 63.1](b)(5)] Operate with a flame present at all times. Subpart A. [40 CFR 63.11(b)(5)]
- 62 [40 CFR 63.1](b)(5)] Presence of a flame monitored by flame monitor continuously. Use a thermocouple or any other equivalent device to detect the presence of a flame. Subpart A. [40 CFR 63.11(b)(5)]
- 63 [40 CFR 63.1](b)(6)(i)(A)] Which Months: All Year Statistical Basis: None specified Diameter  $\geq$  3 in; nonassisted; Hydrogen content  $\geq$  8 % by volume; Exit Velocity  $<$  122 ft/sec (37.2 m/sec) and  $<$  Vmax, as determined using the equation specified in 40 CFR 63.11(b)(6)(i)(A). Subpart A. [40 CFR 63.11(b)(6)(i)(A)]
- 64 [40 CFR 63.1](b)(6)(i)(B)] Which Months: All Year Statistical Basis: None specified Determine the actual exit velocity using the method specified in 40 CFR 63.11(b)(7)(i). Subpart A. [40 CFR 63.11(b)(6)(i)(B)]
- 65 [40 CFR 63.1103(l)(3)] Comply with the requirements of 40 CFR 63 Subpart SS. Subpart YY. [40 CFR 63.1103(l)(3)]
- 66 [40 CFR 63.983(a)(1)] Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]
- 67 [40 CFR 63.983(a)(2)] Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]
- 68 [40 CFR 63.983(a)(3)(i)] Closed-vent systems (containing bypass lines): Flow monitored by flow indicator at the regulation's specified frequency. Ensure that the flow indicator is capable of taking periodic readings. Install at the entrance to any bypass line. Subpart SS. [40 CFR 63.983(a)(3)(i)]
- 69 [40 CFR 63.983(b)(1)(i)(A)] Which Months: All Year Statistical Basis: None specified Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
- 70 [40 CFR 63.983(b)(1)(i)(B)] Which Months: All Year Statistical Basis: None specified Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0002 B-2 - Unit # 2 Flare**

- 71 [40 CFR 63.983(b)(1)(ii)] Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]
- Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems (containing bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Subpart SS. [40 CFR 63.983(b)(4)(i)]
- Closed-vent systems (containing bypass lines): Equipment/operational data monitored by visual inspection/determination monthly. Visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. Subpart SS. [40 CFR 63.983(b)(4)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- Meet the performance requirements in 40 CFR 63.987(a)
- Conduct an initial flare compliance assessment that meets the requirements specified in 40 CFR 63.987(b)(3)(i) through (b)(3)(iv). Subpart SS. [40 CFR 63.987(b)]
- 72 [40 CFR 63.983(b)(2)(i)]
- 73 [40 CFR 63.983(b)(2)(ii)]
- 74 [40 CFR 63.983(b)(3)(i)]
- 75 [40 CFR 63.983(b)(3)(ii)]
- 76 [40 CFR 63.983(b)(4)(i)]
- 77 [40 CFR 63.983(b)(4)(ii)]
- 78 [40 CFR 63.983(d)(1)]
- 79 [40 CFR 63.983(d)(2)]
- 80 [40 CFR 63.983(d)(3)]
- 81 [40 CFR 63.987(a)]
- 82 [40 CFR 63.987(b)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER2008003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0002 B-2 - Unit # 2 Flare**

- 83 [40 CFR 63.987(c)]  
Presence of a flame monitored by the regulation's specified method(s) continuously. Use a device (including, but not limited to a thermocouple, ultra-violet beam sensor, or infrared sensor) capable of continuously detecting that at least one pilot flame or the flare flame is present. Subpart SS. [40 CFR 63.987(c)]
- 84 [40 CFR 63.998] Which Months: All Year Statistical Basis: None specified  
Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- 85 [40 CFR 63.999(a)(1)(i)] Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- 86 [40 CFR 63.999(a)(1)(ii)] Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
- 87 [40 CFR 63.999(a)(1)(iii)] Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
- 88 [40 CFR 63.999(a)(1)(iv)] Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment, as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
- 89 [40 CFR 63.999(b)] Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 90 [40 CFR 63.999(c)] Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 91 [40 CFR 63.999(d)(1)] Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 92 [40 CFR 63.999(d)(2)] Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 93 [LAC 33:III.1105] Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.  
Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0002 B-2 - Unit # 2 Flare**

- 94 [LAC 33:III.1(05)]  
 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:I.3923. Notification is required only if the upset cannot be controlled in six hours.
- 95 [LAC 33:III.1503.C]  
 Sulfur dioxide <= 2000 ppmv at standard conditions.  
 Which Months: All Year Statistical Basis: Three-hour average  
 Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1.503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
- 96 [LAC 33:III.1503.D.1]  
 Control process gas streams by flaring or combustion.
- 97 [LAC 33:III.1509]  
 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 98 [LAC 33:III.1513.A.2]  
 Submit compliance determination results: Due no later than 90 days after completion of test.
- 99 [LAC 33:III.1513.A.2]  
 Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 100 [LAC 33:III.1513.B.3]  
 Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 101 [LAC 33:III.1513.E]  
 Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 102 [LAC 33:III.1513.E]  
 Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 103 [LAC 33:III.1513.E]  
 The permittee shall maintain a record of flare outages and report them to the Office of Environmental Compliance with the annual report under LAC 33:III.918.
- 104 [LAC 33:III.509]  
 This smokeless flare shall be equipped with a flame detection and automatic alarm system that will immediately signal outage of the pilot light.
- 105 [LAC 33:III.509]
- EQT0003 B-3 - Unit # 3 Flare**
- 106 [40 CFR 63.1(b)(1)]  
 Monitor flares to assure that they are operated and maintained in conformance with their designs. Subpart A. [40 CFR 63.11(b)(1)]
- 107 [40 CFR 63.1(b)(3)]  
 Operate at all times when emissions may be vented to the flare. Subpart A. [40 CFR 63.11(b)(3)]
- 108 [40 CFR 63.1(b)(4)]  
 Design and operate for no visible emissions, as determined using Test Method 22 in Appendix A of 40 CFR 60, except for periods not to exceed a total of 5 minutes during any two consecutive hours. Subpart A. [40 CFR 63.11(b)(4)]
- 109 [40 CFR 63.1(b)(5)]  
 Operate with a flame present at all times. Subpart A. [40 CFR 63.11(b)(5)]
- 110 [40 CFR 63.1(b)(5)]  
 Presence of a flame monitored by flame monitor continuously. Use a thermocouple or any other equivalent device to detect the presence of a flame. Subpart A. [40 CFR 63.11(b)(5)]
- 111 [40 CFR 63.1(b)(6)(i)(A)]  
 Which Months: All Year Statistical Basis: None specified  
 Diameter >= 3 in; nonassisted; Hydrogen content >= 8 % by volume; Exit Velocity < 122 ft/sec (37.2 m/sec) and < Vmax, as determined using the equation specified in 40 CFR 63.11(b)(6)(i)(A). Subpart A. [40 CFR 63.11(b)(6)(i)(A)]
- 112 [40 CFR 63.1(b)(6)(i)(B)]  
 Which Months: All Year Statistical Basis: None specified  
 Determine the actual exit velocity using the method specified in 40 CFR 63.11(b)(7)(i). Subpart A. [40 CFR 63.11(b)(6)(i)(B)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0003 B-3 - Unit # 3 Flare**

- 113 [40 CFR 63.1103(b)(3)] Comply with the requirements of 40 CFR 63 Subpart SS. Subpart YY. [40 CFR 63.1103(h)(3)]  
 Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]  
 Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]  
 Closed-vent systems (containing bypass lines): Flow monitored by flow indicator at the regulation's specified frequency. Ensure that the flow indicator is capable of taking periodic readings. Install at the entrance to any bypass line. Subpart SS. [40 CFR 63.983(a)(3)(i)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(ii)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]
- Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified  
 Closed-vent systems (containing bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Subpart SS. [40 CFR 63.983(b)(4)(i)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0003 B-3 - Unit # 3 Flare**

- 125 [40 CFR 63.983(b)(4)(ii)] Closed-vent systems (containing bypass lines): Equipment/operational data monitored by visual inspection/determination monthly. Visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line. Subpart SS. [40 CFR 63.983(b)(4)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 126 [40 CFR 63.983(d)(1)] Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(i)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- 127 [40 CFR 63.983(d)(2)] Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 128 [40 CFR 63.983(d)(3)] Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- 129 [40 CFR 63.987(a)] Meet the performance requirements in 40 CFR 63.11(b). Subpart SS. [40 CFR 63.987(a)]
- 130 [40 CFR 63.987(b)] Conduct an initial flare compliance assessment that meets the requirements specified in 40 CFR 63.987(b)(3) through (b)(3)(iv). Subpart SS. [40 CFR 63.987(b)]
- 131 [40 CFR 63.987(c)] Presence of a flame monitored by the regulation's specified method(s) continuously. Use a device (including but not limited to a thermocouple, ultra-violet beam sensor, or infrared sensor) capable of continuously detecting that at least one pilot flame or the flare flame is present. Subpart SS. [40 CFR 63.987(c)]
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(ii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
- 132 [40 CFR 63.998] Submit application for a waiver of an initial performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
- 133 [40 CFR 63.999(a)(1)(i)]
- 134 [40 CFR 63.999(a)(1)(i)]
- 135 [40 CFR 63.999(a)(1)(iii)]

**SPECIFIC REQUIREMENTS**

**AI ID:** 4174 - Sid Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

**EQT0003 B-3 - Unit # 3 Flare**

- 136 [40 CFR 63.999(a)(1)(iv)]  
 Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment, as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
- 137 [40 CFR 63.999(b)]  
 Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 138 [40 CFR 63.999(c)]  
 Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 139 [40 CFR 63.999(d)(1)]  
 Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1)(i) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 140 [40 CFR 63.999(d)(2)]  
 Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 141 [LAC 33:III.1105]  
 Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.
- Which Months: All Year Statistical Basis: None specified  
 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33:III.13923. Notification is required only if the upset cannot be controlled in six hours.  
 Sulfur dioxide <= 2000 ppmv at standard conditions.
- Which Months: All Year Statistical Basis: Three-hour average  
 Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.  
 Control process gas streams by flaring or combustion.  
 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 147 [LAC 33:III.1513.A.2]  
 Submit compliance determination results: Due no later than 90 days after completion of test.  
 Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.  
 Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 148 [LAC 33:III.1513.B.3]  
 Submit excess emissions report: Due quarterly in accordance with LAC 33:1.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 149 [LAC 33:III.1513.E]  
 150 [LAC 33:III.1513.E]

**SPECIFIC REQUIREMENTS**

**All ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0003 B-3 - Unit # 3 Flare**

151 [LAC 33:III.1513.E]

Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.

The permittee shall maintain a record of flare outages and report them to the Office of Environmental Compliance with the annual report under LAC 33:III.918.

This smokeless flare shall be equipped with a flame detection and automatic alarm system that will immediately signal outage of the pilot light.

**EQT0004 D-2.7 - West Dryer Stack**

154 [40 CFR 63.1103(i)(3)]

HAP  $\geq 98\%$  reduction by weight, or HAP  $<= 20 \text{ ppmv}$ , whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices meeting the requirements of 40 CFR 63.982(a)(2). Subpart YY. [40 CFR 63.1103(f)(3)]

Which Months: All Year Statistical Basis: None specified

Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]

Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]

Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppm above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(A)]

Which Months: All Year Statistical Basis: None specified  
Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(B)]

Which Months: All Year Statistical Basis: None specified  
Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppm above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]

Which Months: All Year Statistical Basis: None specified  
Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]

Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]

Which Months: All Year Statistical Basis: None specified  
Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0004 D-2.7 - West Dryer Stack**

- 163 [40 CFR 63.983(b)(3)(ii)] Closed-event systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 164 [40 CFR 63.983(d)(1)] Closed-event systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(c), if there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983(b)(1)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- 165 [40 CFR 63.983(d)(2)] Closed-event systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 166 [40 CFR 63.983(d)(3)] Closed-event systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- 167 [40 CFR 63.984(a)(1)] Operate at all times when regulated material emissions are being routed. Subpart SS. [40 CFR 63.984(a)(1)]. [40 CFR 63.984(a)(1)]
- 168 [40 CFR 63.984(b)(2)] Ensure that regulated material in routed emissions meets one or more of the following conditions: Recycled and/or consumed in the same manner as a material that fulfills the same function in that process; transformed by chemical reaction into materials that are not regulated materials; incorporated into a product; and/or recovered. Subpart SS. [40 CFR 63.984(b)(2)]. [40 CFR 63.984(b)(2)]
- 169 [40 CFR 63.988(a)(2)] Operate at all times when emissions are vented to control device. Subpart SS. [40 CFR 63.988(a)(2)]
- 170 [40 CFR 63.988(a)(3)] Introduce the vent stream into the flame zone of the boiler or process heater. Subpart SS. [40 CFR 63.988(a)(3)]
- 171 [40 CFR 63.988(b)(1)] Conduct an initial performance test according to the procedures in 40 CFR 63.997, except as specified in 40 CFR 63.997(b) and 40 CFR 63.988(b)(2). Subpart SS. [40 CFR 63.988(b)(1)]
- 172 [40 CFR 63.998] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.
- 173 [40 CFR 63.999(a)(1)(i)] Notify DEQ of the intention to conduct a performance test or flare compliance assessment: Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
- 174 [40 CFR 63.999(a)(1)(ii)] Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
- 175 [40 CFR 63.999(a)(1)(iii)] Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0004 D-2.7 - West Dryer Stack**

- 176 [40 CFR 63.999(a)(1)(iv)]  
Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment, as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
- 177 [40 CFR 63.999(b)].  
Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
- 178 [40 CFR 63.999(c)]  
Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
- 179 [40 CFR 63.999(d)(1)]  
Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
- 180 [40 CFR 63.999(d)(2)]  
Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
- 181 [LAC 33:III.1101.B]  
Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 182 [LAC 33:III.1311.C]  
Which Months: All Year Statistical Basis: None specified  
Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
Which Months: All Year Statistical Basis: Six-minute average  
Sulfur dioxide <= 2000 ppm at standard conditions.
- 183 [LAC 33:III.1503.C]  
Which Months: All Year Statistical Basis: Three-hour average
- 184 [LAC 33:III.1503.D.1]  
Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
- 185 [LAC 33:III.1511.C.2.b]  
186 [LAC 33:III.1511.C.2.b]  
Determine input sulfur value daily.
- 187 [LAC 33:III.1513.A.2]  
Fuel rate monitored by CMS continuously. Monitor the fuel consumption rate.  
Which Months: All Year Statistical Basis: None specified  
Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 188 [LAC 33:III.1513.A.2]  
189 [LAC 33:III.1513.B.2]  
Submit compliance determination results: Due no later than 90 days after completion of test.  
Sulfur recordkeeping by electronic or hard copy continuously. Record the fuel and/or feedstock consumption rate. Also record the input sulfur at the frequencies specified in LAC 33:III.1513.B.2.a and B.2.b.
- 190 [LAC 33:III.1513.E]  
Make all compliance data available to a representative of DEQ or the U.S. EPA on request.

**SPECIFIC REQUIREMENTS**

**AI ID:** 4174 - Std Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

**EQT0004 D-2.7 - West Dryer Stack**

- 191 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:1.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 192 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 193 [LAC 33:III.507.H.1.a] Conduct a performance/emissions test: Due within five years, plus or minus 6 months, of when the previous performance test was performed, or within 180 days after the issuance of a permit renewal, whichever comes later. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of permitted maximum capacity. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 6C - Determination of Sulfur Dioxide Emissions from Stationary Sources; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack tests methods only with the prior approval of the Office of Environmental Assessment. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 194 [LAC 33:III.507.H.1.a] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 195 [LAC 33:III.507.H.1.a] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO<sub>2</sub>/ton 100% H<sub>2</sub>SO<sub>4</sub>, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H<sub>2</sub>SO<sub>4</sub> was being produced).

**EQT0005 D-5.0 - East Dryer Stack**

- 196 [40 CFR 63.1103(l)(3)] HAP >= 98 % reduction by weight, or HAP <= 20 ppmv, whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices meeting the requirements of 40 CFR 63.982(a)(2). Subpart YY. [40 CFR 63.1103(f)(3)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems: Ensure that each closed-vent system is designed and operated to collect the regulated material vapors from the emission point, and to route the collected vapors to a control device. Subpart SS. [40 CFR 63.983(a)(1)]
- Closed-vent systems: Operate at all times when emissions are vented to, or collected by, them. Subpart SS. [40 CFR 63.983(a)(2)]
- Closed-vent systems (hard-piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(i)(A)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent systems (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart SS. [40 CFR 63.983(b)(1)(i)(B)]
- Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

AI ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER20080003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

**EQT0005 D-5.0 - East Dryer Stack**

- 201 [40 CFR 63.983(b)(1)(ii)] Closed-vent systems (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. If an instrument reading of 500 ppmv above background is measured, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.983(d)(2). Subpart SS. [40 CFR 63.983(b)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 202 [40 CFR 63.983(b)(2)(i)] Closed-vent systems (unsafe-to-monitor): Determine that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 63.983(b)(1). Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(i)]
- 203 [40 CFR 63.983(b)(2)(ii)] Closed-vent systems (unsafe-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practical during safe-to-inspect times, at least once annually. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- 204 [40 CFR 63.983(b)(3)(i)] Closed-vent systems (difficult-to-monitor): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(i)]
- 205 [40 CFR 63.983(b)(3)(ii)] Closed-vent systems (difficult-to-monitor): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment at least once every 5 years. Comply with this requirement instead of the requirements in 40 CFR 63.983(b)(1). Subpart SS. [40 CFR 63.983(b)(3)(ii)]
- 206 [40 CFR 63.983(d)(1)] Closed-vent systems (hard piping): Eliminate leak, or monitor according to the procedures in 40 CFR 63.983(b)(1)(i)(B). Subpart SS. [40 CFR 63.983(d)(1)]
- 207 [40 CFR 63.983(d)(2)] Closed-vent systems: Repair leaks as soon as practical, except as provided in 40 CFR 63.983(d)(3). Make a first attempt at repair no later than 5 days after the leak is detected, and complete repairs no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. Subpart SS. [40 CFR 63.983(d)(2)]
- 208 [40 CFR 63.983(d)(3)] Closed-vent systems (delay of repair allowed): Repair equipment as soon as practical, but not later than the end of the next closed-vent system shutdown. Subpart SS. [40 CFR 63.983(d)(3)]
- 209 [40 CFR 63.984(a)(1)] Operate at all times when regulated material emissions are being routed. Subpart SS. [40 CFR 63.984(a)(1)]. [40 CFR 63.984(a)(1)]
- 210 [40 CFR 63.984(b)(2)] Ensure that regulated material in routed emissions meets one or more of the following conditions: Recycled and/or consumed in the same manner as a material that fulfills the same function in that process; transformed by chemical reaction into materials that are not regulated materials; incorporated into a product; and/or recovered. Subpart SS. [40 CFR 63.984(b)(2)]. [40 CFR 63.984(b)(2)]
- 211 [40 CFR 63.988(a)(2)] Operate at all times when emissions are vented to control device. Subpart SS. [40 CFR 63.988(a)(2)]
- 212 [40 CFR 63.988(a)(3)] Introduce the vent stream into the flame zone of the boiler or process heater. Subpart SS. [40 CFR 63.988(a)(3)]
- 213 [40 CFR 63.988(b)(1)] Conduct an initial performance test according to the procedures in 40 CFR 63.997, except as specified in 40 CFR 63.997(b) and 40 CFR 63.988(b)(2). Subpart SS. [40 CFR 63.988(b)(1)]
- 214 [40 CFR 63.998] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.998(a) through (d), as applicable. Subpart SS.

**SPECIFIC REQUIREMENTS**

**AI ID:** 4174 - Sid Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

**EQT0005 D-5.0 - East Dryer Stack**

215	[40 CFR 63.999(a)(1)(i)]	Notify DEQ of the intention to conduct a performance test or flare compliance assessment. Due at least 30 days before such a compliance demonstration is scheduled to allow DEQ the opportunity to have an observer present. Notify DEQ as soon as possible of any delay in the original demonstration date, if after 30 days notice for such an initially scheduled compliance demonstration, there is a delay (due to operational problems, etc.) in conducting the scheduled compliance demonstration. Provide at least 7 days prior notice of the rescheduled date of the compliance demonstration, or arrange a rescheduled date with DEQ by mutual agreement. Subpart SS. [40 CFR 63.999(a)(1)(i)]
216	[40 CFR 63.999(a)(1)(ii)]	Submit performance test and flare compliance assessment reports, if not submitted as part of a Notification of Compliance Status report, to DEQ within 60 days of completing the test or determination, unless specified differently. Include the information specified in 40 CFR 63.999(a)(2)(i) through (a)(2)(iii). Subpart SS. [40 CFR 63.999(a)(1)(ii)]
217	[40 CFR 63.999(a)(1)(iii)]	Submit application for a waiver of an initial performance test or flare compliance assessment, as allowed by 40 CFR 63.997(b)(2), no later than 90 days before the performance test or compliance assessment is required. Include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the source performing the test. Subpart SS. [40 CFR 63.999(a)(1)(iii)]
218	[40 CFR 63.999(a)(1)(iv)]	Submit application to substitute a prior performance test or compliance assessment for an initial performance test or compliance assessment as allowed by 40 CFR 63.997(b)(1), no later than 90 days before the performance test or compliance test is required. Include information demonstrating that the prior performance test or compliance assessment was conducted using the same methods specified in 40 CFR 63.997(e) or 40 CFR 63.987(b)(3), as applicable. Also include information demonstrating that no process changes have been made since the test, or that the results of the performance test or compliance assessment reliably demonstrate compliance despite process changes. Subpart SS. [40 CFR 63.999(a)(1)(iv)]
219	[40 CFR 63.999(b)]	Submit Notification of Compliance Status: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(b)(1) through (b)(5), as applicable. Subpart SS. [40 CFR 63.999(b)]
220	[40 CFR 63.999(c)]	Submit Periodic Report: Due as specified in the referencing subpart. Include the information specified in 40 CFR 63.999(c)(1) through (c)(7). Subpart SS. [40 CFR 63.999(c)]
221	[40 CFR 63.999(d)(1)]	Submit request for approval to use alternatives to continuous operating parameter monitoring and recordkeeping provisions, as provided for in 40 CFR 63.996(d)(1), as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(1) and (d)(1)(ii). Subpart SS. [40 CFR 63.999(d)(1)]
222	[40 CFR 63.999(d)(2)]	Submit request for approval to monitor a different parameter than those established in 40 CFR 63.996(c)(6) or to set unique monitoring parameters, as provided for in 40 CFR 63.996(d)(2), as specified as specified in a referencing subpart. Include the information specified in 40 CFR 63.999(d)(2)(i) through (d)(2)(iii). Subpart SS. [40 CFR 63.999(d)(2)]
223	[LAC 33:II.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
224	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
225	[LAC 33:III.1503.C]	Which Months: All Year Statistical Basis: Six-minute average Sulfur dioxide <= 2000 ppm at standard conditions.
		Which Months: All Year Statistical Basis: Three-hour average

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0005 D-5.0 - East Dryer Stack**

- 226 [LAC 33:III.1503.D.1] Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.  
 Determine input sulfur value daily.
- 227 [LAC 33:III.1511.C.2.b] Fuel rate monitored by CMS continuously. Monitor the fuel consumption rate.
- 228 [LAC 33:III.1511.C.2.b] Which Months: All Year Statistical Basis: None specified  
 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 229 [LAC 33:III.1513.A.2] Submit compliance determination results: Due no later than 90 days after completion of test.
- 230 [LAC 33:III.1513.A.2] Sulfur recordkeeping by electronic or hard copy continuously. Record the fuel and/or feedstock consumption rate. Also record the input sulfur at the frequencies specified in LAC 33:III.1513.B.2.a and B.2.b.
- 231 [LAC 33:III.1513.B.2] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 232 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:III.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 233 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 234 [LAC 33:III.1513.E] Conduct a performance/emissions test: Due within five years, plus or minus 6 months, of when the previous performance test was performed, or within 180 days after the issuance of a permit renewal, whichever comes later. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of permitted maximum capacity. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 6C - Determination of Sulfur Dioxide Emissions from Stationary Sources; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 235 [LAC 33:III.507.H.1.a] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 236 [LAC 33:III.507.H.1.a] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment.
- 237 [LAC 33:III.1311.C] The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO<sub>2</sub> / ton 100% H<sub>2</sub>SO<sub>4</sub>, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H<sub>2</sub>SO<sub>4</sub> was being produced).

**EQT0006 DF-1 - Dryer Bag Filter No. 1**

- 238 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
 Which Months: All Year Statistical Basis: Six-minute average

**SPECIFIC REQUIREMENTS**

AI ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER20080003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

**EQT0007 DF-2 - Dryer Bag Filter No. 2**

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

**EQT0008 SF-1 - Secondary Filter No. 1**

Operate at all times when regulated material emissions are being routed. Subpart SS. [40 CFR 63.984(a)(1)]  
 Ensure that regulated material in routed emissions meets one or more of the following conditions: Recycled and/or consumed in the same manner as a material that fulfills the same function in that process; transformed by chemical reaction into materials that are not regulated materials; incorporated into a product; and/or recovered. Subpart SS. [40 CFR 63.984(b)(2)]  
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

**EQT0009 SF-2 - Secondary Filter No. 2**

Operate at all times when regulated material emissions are being routed. Subpart SS. [40 CFR 63.984(a)(1)]  
 Ensure that regulated material in routed emissions meets one or more of the following conditions: Recycled and/or consumed in the same manner as a material that fulfills the same function in that process; transformed by chemical reaction into materials that are not regulated materials; incorporated into a product; and/or recovered. Subpart SS. [40 CFR 63.984(b)(2)]  
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

**EQT0010 SF-3A - Secondary Filter No. 3A**

Operate at all times when regulated material emissions are being routed. Subpart SS. [40 CFR 63.984(a)(1)]  
 Ensure that regulated material in routed emissions meets one or more of the following conditions: Recycled and/or consumed in the same manner as a material that fulfills the same function in that process; transformed by chemical reaction into materials that are not regulated materials; incorporated into a product; and/or recovered. Subpart SS. [40 CFR 63.984(b)(2)]  
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

**EQT0011 30 - Fire Water Pump**

**SPECIFIC REQUIREMENTS**

AI ID: 4174 - Sid Richardson Carbon & Energy Co  
 Activity Number: PER20080003  
 Permit Number: 3120-00006-V1  
 Air - Title V Regular Permit Renewal

**EQT0011 30 - Fire Water Pump**

249 [LAC 33.III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  
 Which Months: All Year Statistical Basis: Six-minute average  
 Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

**EQT0015 U-1 - Reactor Unit 1**

251 [LAC 33.III.509] In the event that a flare becomes inoperable, carbon black oil feed to the affected carbon black reactor shall cease immediately.

**EQT0016 U-2 - Reactor Unit 2**

252 [LAC 33.III.509] In the event that a flare becomes inoperable, carbon black oil feed to the affected carbon black reactor shall cease immediately.

**EQT0017 U-3 - Reactor Unit 3**

253 [LAC 33.III.509] In the event that a flare becomes inoperable, carbon black oil feed to the affected carbon black reactor shall cease immediately.  
**EQT0019 DF-3 - Dryer Bag Filter No. 3**  
 254 [LAC 33.III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
 Which Months: All Year Statistical Basis: Six-minute average

**EQT0020 Unit 1 PBF - Unit 1 Primary Bag Filter**

255 [40 CFR 63.1103(f)(3)] HAP >= 98 % reduction by weight, or HAP <= 20 ppmv, whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices meeting the requirements of 40 CFR 63.982(a)(2). Subpart YY. [40 CFR 63.1103(f)(3)]  
 Which Months: All Year Statistical Basis: None specified

**EQT0021 Unit 2 PBF - Unit 2 Primary Bag Filter**

256 [40 CFR 63.1103(f)(3)] HAP >= 98 % reduction by weight, or HAP <= 20 ppmv, whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices meeting the requirements of 40 CFR 63.982(a)(2). Subpart YY. [40 CFR 63.1103(f)(3)]  
 Which Months: All Year Statistical Basis: None specified

**EQT0022 Unit 3 PBF - Unit 3 Primary Bag Filter**

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**EQT0022 Unit 3 PBF - Unit 3 Primary Bag Filter**

HAP >= 98 % reduction by weight, or HAP <= 20 ppmv, whichever is less stringent, by venting emissions through a closed-vent system to any combination of control devices meeting the requirements of 40 CFR 63.982(a)(2). Subpart YY. [40 CFR 63.1103(f)(3)]  
 Which Months: All Year Statistical Basis: None specified

**FUG0001 50 - Fugitive Emissions**

Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A. 1-7.

**UNF0001 Addis Facility**

- 259 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.  
 260 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in 40 CFR 63 Subpart YY.
- 261 [40 CFR 70.5(a)(1)(iii)] Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]  
 262 [40 CFR 70.6(a)(3)(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 263 [40 CFR 70.6(a)(3)(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
- 264 [40 CFR 70.6(c)(3)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]  
 265 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 266 [LAC 33:III.1303.B] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 267 [LAC 33:III.2113.A] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 268 [LAC 33:III.219] TPOR0147

**SPECIFIC REQUIREMENTS**

**AI ID: 4174 - Sid Richardson Carbon & Energy Co**  
**Activity Number: PER20080003**  
**Permit Number: 3120-00006-V1**  
**Air - Title V Regular Permit Renewal**

**UNFO001 Addis Facility**

- Comply with the requirements of PSD-LA-152(M-4). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-152(M-4).
- Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature and phone number of the responsible official.
- Submit Annual Emissions Report (TED): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:1.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:1.3923.
- Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:1.3931.
- Submit notification in the manner provided in LAC 33:1.3923.
- Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.

**SPECIFIC REQUIREMENTS**

**AI ID:** 4174 - Sid Richardson Carbon & Energy Co  
**Activity Number:** PER20080003  
**Permit Number:** 3120-00006-V1  
**Air - Title V Regular Permit Renewal**

**UNF0001 Addis Facility**

- 282 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 283 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 284 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 285 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 286 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.